

Exhibit 38

STATE OF TEXAS, ET AL. v. UNITED STATES OF AMERICA, ET AL.
Ike Brannon on 06/26/2018

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF TEXAS
3 BROWNSVILLE DIVISION

4 -----x
5 STATE OF TEXAS, et al.,)
6 Plaintiffs,)
7 v) Case No.
8 UNITED STATES OF AMERICA, et al.,) 1:18cv00068
9 Defendants,)
10 and)
11 KARLA PEREZ, et al.,)
12 Defendant-intervenors.)
13 -----x

14 DEPOSITION OF IKE BRANNON

15 Washington, D C

16 Tuesday, June 26, 2018

17 1:56 p.m.

18

19

20 Job No.: 207169

21 Pages: 1 - 138

22 Reported by: Donna Marie Lewis, RPR, CSR (HI)

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14 Deposition of IKE BRANNON, held at Regus
15 Business Center, 2200 Pennsylvania Avenue, NW, 4th
16 Floor East, Washington, D C 20037, pursuant to
17 Notice, before Donna Marie Lewis, Registered
18 Professional Reporter and Notary Public of and for
19 the District of Columbia.

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1 A P P E A R A N C E S

2 ON BEHALF OF PLAINTIFFS:

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11 ON BEHALF OF DEFENDANTS:

12 UNITED STATES DEPARTMENT OF JUSTICE
OFFICE OF IMMIGRATION LITIGATION

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1 APPEARANCES: (Continued)

2 ON BEHALF OF THE WITNESS:

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1 million. It would have an impact on the labor
2 market if -- a more severe impact on the labor
3 market of low income people if they had 700,000
4 more people to compete with.

5 Q Because it would increase competition
6 for those individuals, correct?

7 A It would.

8 Q How many DACA recipients are you aware
9 of that you would consider low skilled?

10 A Well, two-thirds since -- we estimate
11 two-thirds are going to have some kind of college,
12 so at most it's going to be one-third or less.

13 Q So one-third or less would be considered
14 low skilled, for lack of a better phrase?

15 A Yeah. And probably a little bit less
16 than that, yeah.

17 Q That one-third, that would increase
18 competition with other people who are citizens who
19 are also competing for those low skilled jobs,
20 correct?

21 A That's right. But since these workers
22 are relatively mobile, we would argue that they

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1 would have relatively low impact on their wages.

2 Q But an impact nonetheless, correct?

3 A Correct.

4 MR. BIGGS: All right. Let's actually
5 take five minutes, if that's okay.

6 THE WITNESS: Sure.

7 MR. BIGGS: I think I'm getting close to
8 being done. We will get you out of here -- well,
9 subject to anybody else asking you questions.

10 THE WITNESS: That's great.

11 MR. GOLDSMITH: I will have some
12 questions.

13 (The proceedings recessed from 3:50 p.m.
14 to 3:59 p.m.)

15 (Exhibit No. 2 was marked for
16 identification.)

17 BY MR. BIGGS:

18 Q I hand you what is marked as Exhibit 2
19 to your deposition. I actually might be one
20 short. I apologize for that.

21 Sir, have you seen Exhibit 1 before --
22 or Exhibit 2 before?

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1 REPORTER'S CERTIFICATE

2 I, DONNA M. LEWIS, RPR, Certified

3 Shorthand Reporter, certify;

4 That the foregoing proceedings were
5 taken before me at the time and place therein set
6 forth, at which time the witness, Ike Brannon, was
7 put under oath by me;

8 That the testimony of the witness, the
9 questions propounded and all objections and
10 statements made at the time of the examination
11 were recorded stenographically by me and were
12 thereafter transcribed;

13 I declare that I am not of counsel to
14 any of the parties, nor in any way interested in
15 the outcome of this action.

16 As witness, my hand and notary seal this
17 28th day of June, 2018.

18
19 
20

20 _____
21 Donna M. Lewis, RPR
22 Notary Public

21 My Commission expires:
22 March 14, 2023